

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AVI AVRAHAM ZINGER and
AMERICAN QUALITY PRODUCTS
LTD.,

Plaintiffs,

-against-

BEN & JERRY'S HOMEMADE, INC.,
UNILEVER UNITED STATES, INC.
and CONOPCO, INC.,

Defendants.

Civ. No. 2:22-cv-01154-ES-JBC

Hon. Esther Salas

**ORAL ARGUMENT
REQUESTED**

Motion Day: June 6, 2022

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that on June 6, 2022, at 9:00 A.M.,
or as soon thereafter as this matter may be heard, Defendants Ben & Jerry's
Homemade, Inc., Unilever United States, Inc. and Conopco, Inc.
("Defendants"), by and through their undersigned counsel, shall move before
the Honorable Esther Salas, U.S.D.J., at the Martin Luther King, Jr. Building
& U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order
dismissing the Complaint filed by Avi Avraham Zinger and American
Quality Products Ltd. in its entirety, and granting such other and further
relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants shall rely upon the accompanying Memorandum of Law and the declaration of Gary A. Bornstein, dated May 2, 2022, with exhibits annexed thereto, filed herewith.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Respectfully submitted,
BEN & JERRY'S HOMEMADE, INC.,
UNILEVER UNITED STATES, INC. and
CONOPCO, INC.

By their attorneys,

/s/ Jennifer A. Hradil
Jennifer A. Hradil
Thomas R. Valen
Jeffrey L. Nagel (admitted *pro hac vice*)
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